REMARKS

Applicants respectfully request reconsideration of the present U.S. Patent application.

Claim Rejections - 35 U.S.C. § 103(a)

Claims 1-24 and 26-66 were rejected as being unpatentable over U.S. Patent No. 6,097,389 issued to Morris, et al. (*Morris*) in view of U.S. Patent No. 6,166,735 issued to Dom, et al. (*Dom*) and further in view of U.S. Patent No. 5,999,173 issued to Ubillos, et al. (*Ubillos*).

Amended claim 11 recites the following:

displaying a first list of reduced visual representations of a plurality of media objects ordered automatically in chronological order and grouped by media objects relating to one another;

recording an audio narration to be associated with at least one of the reduced visual representations;

displaying a second list of reduced visual representations of the plurality of media objects ordered manually, the second list having the audio narration associated with at least one of the reduced visual representations;

navigating among the reduced visual representations; and displaying the plurality of media objects.

Thus, Applicants claim recording an audio narration associated with at least one reduced visual representation in the first, automatically ordered, list.

Claim 12 and claims 14-20 depend from claim 11. Claim 1 is a means-plusfunction claim that similarly recites an audio narration associated with at least one of the reduced visual representations. Claim 2 and claims 4-10 depend from claim 1. Claims 21 and 38 are respectively a system claim and a method claim that recite recording of audio narrations. Claims 22-24 and claims 26-37 depend from claim 21. Claims 39-61 depend from claim 38.

Applicants agree with the Examiner that *Morris* and *Dom*, separately or combined, do not teach recording a narration to be associated with at least one of the visual representations. Furthermore, in view of the amended claims, Applicants respectfully submit that *Ubillos* does not teach recording audio narrations. *Ubillos* teaches video editing specifically using "stored video clips" (col. 1 lines 6-12). Additionally, *Ubillos* explicitly defines audio clips as "soundtrack corresponding to video" (col. 1 lines 20-21), suggesting that audio clips, like their video counterparts, are previously recorded, imported to the system, and then stored for later editing. Recording an audio narration, however, is a process by which a user creates a new media object. *Ubillos* teaches to identify and later add special effects to existing media objects (col. 3 lines 41-50), whereas claims 1, 11, 21, 38, and 62 recite creation of new media objects, to be associated with existing media objects.

Because *Ubillos* does not teach recording audio narrations to be associated with at least one of the reduced visual representations, no combination of *Morris*, *Dom*, and *Ubillos* can satisfy all the elements of Applicants' claims.

Conclusion

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. For the same reasons, Applicants respectfully submit that claims 1, 11, 21, 38 and 62 and their corresponding dependent claims are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the

undersigned by telephone if such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted, BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP

Date: June 5, 2003

Paul A. Mendonsa Attorney for Applicant Reg. No. 42,879

12400 Wilshire Boulevard Seventh Floor Los Angeles, CA 90025-1026 (503) 684-6200

> I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313 on:

> > 5 June 2003
> > Date of Deposit
> >
> > DEBORAH L. HIGHAM

Name of Person Mailing Correspondence

nature

hata